

EXHIBIT L

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,)
Plaintiff,) Case No.
vs.) CV 10-03561 WHA
GOOGLE, INC.,)
Defendant.)
_____) VOLUME I

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED 30(b)(6) DEPOSITION OF GOOGLE, INC.

DESIGNEE: FELIX LIN

Palo Alto, California

Monday, December 14, 2015

Reported by:

KELLI COMBS, CSR No. 7705

Job No. 2196295

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1 Do you understand that?

2 A Yes.

3 Q All right.

4 And although it can be sometimes difficult
5 because everybody wants to get this over with, if
6 you wait until I finish my questions before you give
7 your answers so that we're not talking over each
8 other, and I'll commit to you to do the same. That
9 will also make it easier for the court reporter.

10 Do you understand?

11 A Yes.

12 Q All right.

13 You'll have an opportunity to review the
14 transcript that is prepared after the deposition,
15 make revisions to any answers that you think require
16 correction. But if you do change your answers in
17 some material way, then I may have the opportunity
18 to comment on that before the jury as to your
19 credibility.

20 Do you understand that?

21 A Yes.

22 Q All right.

23 By whom are you presently employed?

24 A Google.

25 Q Anyone else?

1 A No.

2 Q And what is your current title with
3 Google?

4 A Director of Product Management.

5 Q What are your general duties and
6 responsibilities as a Director of Product Management
7 at Google?

8 A Today, I primarily work with hardware
9 partners, folks like Acer and others, who are
10 building hardware built on Google's operating system
11 platforms.

12 Q Which operating system platforms?

13 A Chrome OS and Android.

14 Q When did you join Google?

15 A April of 2009.

16 Q And what was your title at that time?

17 A Group Product Manager.

18 Q And what product or products --

19 For which product or products did you have
20 responsibility when you joined Google?

21 A Chrome OS.

22 Q How, if at all, have your responsibilities
23 changed over time since you joined Google in May of
24 2009?

25 A I've been working on Chrome OS since the

1 very beginning, and just last year about this time,
2 I picked up responsibility for Android Partner
3 Engineering.

4 Q When you joined Google, was there a
5 Chrome OS?

6 A No. The product had not been announced
7 yet.

8 Q Was it being worked on at the time?

9 MR. RAGLAND: I'll object to outside the
10 scope of the 30(b)(6) topics on which Mr. Lin is
11 presented.

12 But you may answer.

13 THE WITNESS: Sure. We were in the
14 initial discussions about getting the project
15 started.

16 BY MS. HURST:

17 Q So you were there from the very beginning
18 with Chrome OS?

19 A There were some conversations that were --
20 that had taken place before I had gotten there.

21 Q Had the decision yet been made to go
22 forward in creating Chrome OS?

23 A No.

24 MR. RAGLAND: Same objection. Outside the
25 scope.

15 BY MS. HURST:

16 Q How long has ARC Welder been in existence?

17 MR. RAGLAND: Objection to form, outside
18 the scope.

19 THE WITNESS: I can't recall exactly how
20 long, but it seems within the last year.

21 BY MS. HURST:

22 Q Would you say that's a relatively new
23 effort?

24 A Yes.

25 MR. RAGLAND: Same objections.

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23 BY MS. HURST:

24 Q Would you agree that major platform
25 providers in the marketplace are working towards the

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1 goal of having a unified experience for their
2 consumers across all devices?

3 MR. RAGLAND: Objection to form, outside
4 the scope of the noticed topics.

5 THE WITNESS: Could you ask the question
6 again?

7 BY MS. HURST:

8 Q Sure.

9 Would you agree that the major platform
10 providers in the marketplace are working towards the
11 goal of having a unified experience for their
12 consumers across all devices?

13 MR. RAGLAND: Same objections.

14 THE WITNESS: Which companies are you
15 thinking about?

16 BY MS. HURST:

17 Q Well, let's take Apple as an example,
18 Microsoft as an example.

19 MR. RAGLAND: Same objections.

20 THE WITNESS: It's hard for me to talk
21 about strategies of other companies. If you're
22 asking as a consumer what am I seeing, I can answer
23 that.

24 BY MS. HURST:

25 Q All right. And how would you?

1 for people to be able to use the device in some way,
2 true?

3 MR. RAGLAND: Same objections.

4 THE WITNESS: Yes.

5 BY MS. HURST:

6 Q And at the time you released Chrome OS,
7 you already knew how to get people to access the
8 Web, true?

9 MR. RAGLAND: Objection to form and
10 outside the scope.

11 THE WITNESS: Yes.

12 BY MS. HURST:

13 Q So it's true, isn't it, that you built
14 this foundation, at least in part, for applications?

15 MR. RAGLAND: Objection to form, outside
16 the scope of noticed topics.

17 THE WITNESS: We built it to be able to
18 generally use the Web and to also run applications
19 and, you know, to provide a foundation for doing
20 things that we hadn't even imagined yet.

21 BY MS. HURST:

22 Q Does the Chrome OS have a set of developer
23 APIs?

24 MR. RAGLAND: Objection to form, outside
25 the scope.

1 THE WITNESS: Chrome OS makes use of all
2 of the Web APIs for developing applications with
3 HTML5 and JavaScript.

4 BY MS. HURST:

5 Q Other than HTML5 and JavaScript, are there
6 any other developer-oriented APIs associated with
7 Chrome OS?

8 MR. RAGLAND: Same objections.

9 THE WITNESS: We allow people to write
10 applications in native languages like C using a
11 facility called Native Client.

12 BY MS. HURST:

13 Q And is that Native Client associated with
14 some other platform?

15 MR. RAGLAND: Objection to form and
16 outside the scope.

17 THE WITNESS: What -- what other
18 platforms?

19 BY MS. HURST:

20 Q Well, for example, the JNI interface as
21 part of the Java platform is a way of allowing
22 people to integrate applications written in native
23 languages.

24 Are you using --

25 A We don't support Java on Chrome OS.

1 MR. RAGLAND: We've been going about an
2 hour. When it's a convenient time for a break...

3 MS. HURST: Just a few moments and I'll be
4 ready.

5 MR. RAGLAND: That's fine.

6 BY MS. HURST:

7 Q So the Native Client that you mentioned,
8 is that associated with JavaScript? What's it
9 associated with?

10 MR. RAGLAND: Objection to form and
11 outside the scope.

12 THE WITNESS: It's associated with C
13 primarily, C++.

14 BY MS. HURST:

15 Q And is that -- is that built into
16 Chrome OS, that Native Client capability?

17 MR. RAGLAND: Same objections.

18 THE WITNESS: Yes.

19 MS. HURST: All right. This is a
20 convenient time if you'd like a break.

21 MR. RAGLAND: Thank you.

22 THE VIDEOGRAPHER: Going off the record.
23 The time is 10:57.

24 (Recess taken.)

25 THE VIDEOGRAPHER: We're back on the

1 Q And is it your understanding that you are
2 proffered here by Google to testify today on some
3 portion of Topic 3?

4 A Yes.

5 Q And -- and using your own words, what's
6 your understanding of that aspect of Topic 3 that
7 you're to cover?

8 A Just exactly what it says here: The
9 purpose and operation of Google Play Services for
10 what it is and how it's used.

11 Q All right.

12 MR. RAGLAND: Actually, if I could refer
13 back to the discussions we've had among counsel as
14 to the scope of Topic 3, we're presenting Mr. Lin on
15 the aspect of Topic 3 related to licensing,
16 marketing, advertising or distribution of Google
17 Play Services.

18 BY MS. HURST:

19 Q All right.

20 Did you hear that proffer by your counsel,
21 Mr. Lin?

22 A I did.

23 Q And do you consent to testify here today
24 on behalf of Google, Inc. regarding the licensing,
25 marketing, advertising or distribution of Google

1 Play Services?

2 A Yes.

3 MS. HURST: Do you want to make a similar
4 proffer with respect to Topic 4, Mr. Ragland?

5 MR. RAGLAND: No.

6 MS. HURST: So it's all of Topic 4,
7 correct?

8 MR. RAGLAND: All of Topic 4. There is a
9 limitation on Topic 5. We can get to that whenever
10 you like.

11 MS. HURST: All right.

12 BY MS. HURST:

13 Q So, Mr. Lin, you heard Mr. Ragland state
14 that you're being offered to testify on all of
15 Topic 4, true?

16 A Uh-huh.

17 Q Yes?

18 A Yes.

19 BY MS. HURST:

20 Q Thanks.

21 And do you consent to testify on Topic 4
22 on behalf of Google?

23 A Yes.

24 MS. HURST: All right. Mr. Ragland, do
25 you want to make your designation with respect to

1 Topic 5?

2 MR. RAGLAND: Sure. As to Topic Number 5,
3 Mr. Lin is designated to testify as to mobile
4 agreements with OEMs or carriers regarding Google
5 services on non-Android devices. And by "Google
6 services," that's defined as Google Mobile Services
7 and Google Play Services.

8 MS. HURST: Well, I'm not sure that's how
9 we defined it. I think it was broader than that,
10 but that's all right. I think we understood the
11 designation on Topic 5 to be broader than that based
12 on the prior correspondence. I'm not sure there's
13 much we can do about that right now.

14 BY MS. HURST:

15 Q You've heard, Mr. Lin, your counsel's
16 proffer as to your designation on Topic 5?

17 A Yes.

18 Q And do you consent to testify on behalf of
19 Google with respect to Topic 5 as identified by your
20 counsel?

21 A Yes.

22 Q Did you do anything specific to prepare to
23 testify here today? Not just your ordinary course
24 of duties on behalf of Google, but specific to
25 preparing to testify on any of Topics 3, 4 or 5?

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were administered an oath; that a record of
7 the proceedings was made by me using machine shorthand
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that the foregoing pertains to the
12 original transcript of a deposition in a Federal Case,
13 before completion of the proceedings, a review of the
14 transcript [X] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20
21 Dated: 12/16/2015

22
23 
24

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25 CSR No. 7705